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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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**ERRICA JAMES INDIVIDUALLY AND ON  
BEHALF OF HER MINOR DAUGHTER S.C.**

Case No. 3:24-cv-10894-RK-JBD

Plaintiff,

- against -

**BOARD OF EDUCATION OF THE FRANKLIN  
TOWNSHIP PUBLIC SCHOOLS; JOHN  
RAVALLY; NICHOLAS SOLOMON; ROD  
BRUNDIGE; ORVYL WILSON; ANTHONY  
HOLLEY; MAKAI HOWARD; John Does 1-50;  
Jane Does 1-50**

**DECLARATION OF AVRAM  
E. FRISCH IN SUPPORT OF  
THE ENTRY OF DEFAULT**

Defendants.

I, Avram E. Frisch, hereby declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that:

1. I am an attorney at The Law Office of Avram E. Frisch LLC, located at 1 University Plaza, Suite 119, Hackensack, NJ 07601.

2. I am counsel for the Plaintiff in the above-captioned matter.

3. On April 16, 2025, I reviewed the docket in this case and confirmed that Defendant Anthony Holley has failed to answer, plead, or otherwise defend within the time allowed by the Federal Rules of Civil Procedure. The complaint was served on March 18, 2025 and an answer was thus due on April 8, 2025

4. Therefore, Plaintiff requests that the Clerk enter default against Defendant Anthony Holley in accordance with Rule 55(a).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on (date). Executed on April 16, 2025.

/s/ Avram E. Frisch

Avram E. Frisch, Esq.